

REMARKS

In response to the Office Action dated 13 September 2002, claims 1-20 have been amended and new claim 21 has been added. Claims 1-21 are currently pending in the application. No new matter has been added. Reconsideration of the claims is respectfully requested.

On page 2 of the Office Action, the specification was objected to for failing to provide section headings and failing to provide an abstract. The Applicants respectfully traverse the objections, but have amended the specification to provide section headings and have submitted an abstract for insertion into the application. The Applicants respectfully submit that the objections to the specification should be withdrawn in view of the amendments made thereto.

The Applicants note a request for corrected drawings, because several drawings appear unreadable, on page 3 of the Office Action. The Applicants respectfully traverse the objection to the drawings, but are providing formal drawings under separate cover SUBMISSION OF FORMAL DRAWINGS. No new matter has been added. The new submitted formal drawings merely provide identical disclosure in a more readable format. The Applicants respectfully submit that the objection to the drawings should be withdrawn in view of the submitted formal drawings.

In paragraphs 1 and 2 on page 3 of the Office Action, claims 1, 13 and 14 were rejected under 35 U.S.C. §112 second paragraph for being indefinite for failing to particularly point out and distinctly claim the subject matter which the Applicants regards as the invention. The Applicants respectfully traverse this rejection, but have

amended the application to overcome the rejections. Claims 1-20 have been amended. It is believed that all claims comply with 35 U.S.C. §112.]

On pages 4-8 of the Office Action, claims 1-12 and 15-20 were rejected under 35 U.S.C. §103(a) as being unpatentable over Rautiola US Patent 5,949,775 (Rautiola) and Rautiola US Patent 5,956,331 (Rautiola #2), respectively. It is admitted in the Office Action, that Rautiola fails to disclose the Applicants' claimed invention, however, according to the Office Action, the Applicants' claimed invention is obvious in view of the disclosure of the cited references, respectively.

Three criteria must be met to establish a *prima facie* case of obviousness. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference. Second, there must be a reasonable expectation of success. Finally, the prior art reference, or combination of references, must teach or suggest all the claim limitations. MPEP §2142. The Applicants respectfully traverse the rejections because the cited references fail to disclose all the limitations set forth in Applicants' claimed invention.

The Applicants set forth in independent claim 1, a gateway arrangement for receiving traffic including a first type of traffic and a second type of traffic. The gateway arrangement includes a first gateway and a second gateway. The first gateway is arranged to separate the first and second types traffic. The first type of traffic is output to the second gateway. The second gateway is arranged to extract information from the first type of traffic and output the information to the first gateway.

The first gateway has an output interface which is arranged to transmit the second type of traffic dependent upon the extracted information.

The Applicants submit that gateways are used to connect two differing networks or systems. In the Applicants' claimed invention, the two differing systems are a wireless intranet office system and a conventional cellular telecommunications system. A gateway between these two systems needs to be able to handle at least signalling and payload traffic. These two types of traffic should be separated and handled by separate dedicated gateways. The Applicants set forth in independent claim 1, an arrangement adapted to handling and managing the different types of traffic between the two dedicated gateways.

The Applicants set forth in independent claim 1 a gateway arrangement for receiving at least first and second traffic types. The first traffic type is signalling information traffic and the second traffic type is payload information traffic for which two dedicated gateways are required. A first gateway separates the first and second traffic types and outputs the first traffic type to a second gateway. The first gateway is a media gateway and the second gateway is a signalling gateway. The second gateway extracts information from the first type of traffic and outputs it to the first gateway. The extracted information may at least include time slot information and IP address information, for example. The first gateway is arranged to transmit the second type of traffic dependent upon the extracted information. The Applicants' claimed invention provides significant advantages over prior systems in solving problems associated with the differences in the requirements of processing signalling and payload traffic, and because the volume of the payload traffic is generally greater

than that of signalling traffic. Signalling information extracted by the signalling gateway can be sent back to the media gateway, so that the media gateway can transmit the payload traffic to the appropriate destination.

Rautiola is different than the Applicant's claimed invention. Rautiola merely discloses a gateway arrangement for receiving traffic. Rautiola discloses a cellular radio network for use in an office environment that connects to a local area network.

According to the Office Action, Rautiola discloses that different data types, i.e., voice, computer and printer, are transmitted via one gateway, which translates the data types from one format to another and further that a skilled person in the art could separate these processes, for each data type, onto other gateways. However, the text of Rautiola cited in the Office Action merely discloses that various systems can be connected to a LAN. The gateways, in Rautiola, are known in the art and are used to connect different systems together. In Rautiola, there is a gateway at each LAN interface with another system (gateways 1 and 13, as shown in Fig. 2). Thus, Rautiola merely discloses that any translation of formats occurs between a single system and the LAN. Gateways 1 and 13 only handle translation or processing from GSM to LAN and ATM to LAN, respectively. There is no separation of processes, in Rautiola, that could result in a second gateway, as hypothesized in the Office Action.

Rautiola is different from the Applicants' claimed invention at least because Rautiola merely discloses gateways being used to connect systems together whereas the Applicants set forth a first gateway arranged to separate the first and second types of traffic, as set forth in claim 1.

Rautiola is also different from the Applicants' claimed invention because Rautiola merely discloses translation of formats occurring between a single system and a LAN whereas the Applicants set forth a second gateway arranged to extract information from a first type of traffic and output the extracted information to the first gateway, as set forth in claim 1.

The Office Action has hypothesized that two gateways could be implemented in Rautiola, but Rautiola fails to disclose a second gateway extracting information from the first type of traffic and outputting it to the first gateway or implementation thereof.

Rautiola is also different from the Applicants' claimed invention because Rautiola merely discloses a gateway being used to connect systems together whereas the Applicants set forth a first gateway having an output interface arranged to transmit the second type of traffic dependent upon the extracted information as set forth in claim 1.

Rautiola #2 fail to remedy the deficiencies of Rautiola. Rautiola #2 merely discloses an integrated radio communication system. Rautiola #2, even if combined with Rautiola, is different from the Applicants' claimed invention at least because the proposed combination merely results in a system having gateways being used to connect systems together whereas the Applicants set forth a first gateway arranged to separate the first and second types of traffic, a second gateway arranged to extract information from the first type of traffic and output the extracted information to the first gateway, and the first gateway having an output interface arranged to transmit the second type of traffic dependent upon the extracted information , as set forth in claim 1.

For the reasons set forth above, the Applicants respectfully assert that the cited references fail to disclose all the limitations set forth in claim 1. Claim 1 is therefore allowable. Independent claim 20 sets forth similar limitations as those set forth in claim 1, and is therefore allowable over the cited references for at least the same reasons as those provided for claim 1.

Dependent claims 2-19, which are dependent from independent claim 1, were also rejected under 35 U.S.C. §103(a) as being unpatentable over Rautiola and Rautiola #2. While the Applicants do not acquiesce with the particular rejections to these dependent claims, it is asserted that these rejections are moot in view of the remarks made in connection with independent claim 1. These dependent claims include all of the limitations of the base claim and any intervening claims, and recite additional features which further distinguish these claims from the cited references. Therefore, dependent claims 2-19 are also in condition for allowance.

In view of the amendments and reasons provided above, it is believed that all pending claims are in condition for allowance. The Applicants respectfully request favorable reconsideration and early allowance of all pending claims.


If a telephone conference would be helpful in resolving any issues concerning this communication, please contact the Agent for the Applicant's, Fredrick T. French III at (952) 253-4123.

Respectfully submitted,

Altera Law Group, LLC



Date: 12/12/2002

By: 
Fredrick T. French III
Reg. No. P-52,524
Direct Dial: (952) 253-4123

ftf/jsa

APPENDIX A
MARKED UP VERSION OF THE ENTIRE CLAIM SET

The entire set of pending claims is provided for the Examiner's convenience.

Please amend the claims as follows.

1 1. (Amended Once) A gateway arrangement for receiving traffic comprising a
2 first type of traffic and a second type of traffic, [said] the gateway arrangement
3 comprising a first gateway and a second gateway, [said] the first gateway being
4 arranged to separate the first and second types traffic, [said] the first type of traffic
5 being output to [said] the second gateway, [said] the second gateway being
6 arranged to extract information from [said] the first type of traffic and output [said]
7 the information to the first gateway, and [said] the first gateway having an output
8 interface which is arranged to [output] transmit the second type of traffic [in
9 accordance with said] dependent upon the extracted information.

1 2. (Amended Once) [An] The arrangement^s [as claimed in] according to
2 claim 1, wherein the first and second gateways are connected to a connector and the
3 first type of traffic is sent between [said] the first and second gateways via [said] the
4 connector.

1 3. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 2, wherein [said] the connector is provided by a local area network.

1 4. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein the first and second gateways are connected directly to each other.

1 5. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1 wherein [said] the first gateway is arranged to be connected to a mobile
3 telecommunications network.

1 6. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 5, wherein [said] the first gateway has a second interface for connecting to [
3 said] the mobile telecommunications network.

1 7. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the first gateway is arranged to be connected to a wired
3 telecommunications network.

1 8. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the output interface is also an input interface which is
3 arranged to receive first and second types of traffic signals.

1 9. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the first type of traffic is signalling traffic.

1 10. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the second type of traffic is payload traffic.

1 11. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the first and second gateways are connected via a wired
3 connection.

1 12. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the first and second gateways are connected via a wireless
3 connection.

1 13. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein a plurality of first gateways are provided for the [or each] second
3 gateway.

1 14. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 13, wherein eight of [said] the first gateways are provided for the [or each]
3 second gateway.

1 15. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the first gateway is arranged to alter the coding of [said] the
3 second type of traffic.

1 16. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the second gateway is arranged to alter the protocol of [said]
3 the first type of traffic.

1 17. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the output interface is in accordance with [the] ETSI E1
3 standard.

1 18. (Amended Once) [An] The arrangement [as claimed in any one of the
2 preceding claims] according to claim 1, wherein [said] the gateway arrangement is
3 provided between a GSM environment and an IP environment.

1 19. (Amended Once) [An] The arrangement [as claimed in] according to
2 claim 1, wherein [said] the extracted information is at least one of time slot and
3 address information

1 20. (Amended Once) A gateway [, said gateway being] arranged to receive
2 first and second types of traffic, [said] the gateway comprising:

3 means for separating [said] the first and second types of traffic;

4 [output] means for outputting [said] the first type of traffic to a second
5 gateway for processing by [said] the second gateway;

6 [input] means for receiving [said] a processed first type of traffic from [said]
7 the second gateway, whereby the second type of traffic is [output] transmitted by [
8 said output] the means for outputting [in accordance with] dependent upon the
9 processed first type of traffic received from [said] the second gateway.

1 21. (New) The arrangement according to claim 1, wherein the gateway
2 arrangement further comprises a plurality of second gateways.